

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of: |) | |
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| |) | |
| Broadcast Localism |) | MB Docket No. 04- |
| 233 |) | |

COMMENTS OF Andy Parrish, General Manager of NCE station WVSU-FM

On behalf of WVSU-FM radio, I respectfully submit these comments in the above-captioned proceeding.

I have been working in radio all of my adult life, which is about 18 years. My employers have included the nation's largest radio corporation, a family-owned and operated radio station with fewer than 20 employees, and now, a private university which operates a non-commercial educational station.

Based upon my experiences, I acknowledge the need for the Commission to be involved in requiring stations to maintain their commitments to serving their local communities, and I appreciate the Commission's efforts to achieve these necessary objectives.

Regarding the proposals to increase "localism" as outlined in the "REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING," I feel there are some good ideas. However, I am also

concerned that many proposals would create hardships on stations with smaller budgets and smaller staffs, which may actually hinder the well-intentioned objectives. For example, a proposal that all stations have a staff member on duty during all hours of operation would be difficult, and would not enhance our service to the community. I would agree with the opinion that computer automation, when used to excess, is harmful to radio's obligation to serve its local communities. However, in our case, automation allows our small staff and student volunteers to work around class and study time, recording their announcements slightly in advance of their actual on-air shifts. We cannot ask students to work overnights, and do not have the budget to pay workers to staff these hours. Instead, we program music and announcements (including our various public service campaigns) to air overnight. As for potential emergencies, our EAS system relays severe weather and other emergency messages as effectively at 3 am as it does at 3 pm.

Another item in the proposal includes extensive recordkeeping and paperwork requirements that pose particular burdens to noncommercial broadcasters. Again, our station is of limited financial means and staff. Requiring stations to, for example, post all public file records on the Web would be extremely burdensome. Our station receives letters and e-mail correspondence regularly from listeners. Although it would be of great promotional value for us to post these items on the Web, the time involved in reformatting documents and acquiring the Web space to display them would be impossible for our staff and budget as they currently exist.

These are but a few examples of the burdens such requirements would create. I would be supportive of finding other means for NCE stations to reach the objectives of the Commission. For example, rather than a requirement that all public file documents be available on the Web, stations could instead post notices on the Web (and on the air, for that matter), stating that public file records are available to the public, and giving information on how best to obtain those records.

In summary, I would point out that NCE stations operate for completely different purposes than for-profit stations. Most college radio stations, such as ours, exist to serve not only the local community, but as an educational laboratory for students who will go on to work in professional media environments. Therefore, I would encourage the Commission to consider different regulations for NCE stations, when it comes to encouraging “localism.” I feel strongly that WVSU-FM, dollar-for-dollar, serves its community better than any of the largest radio corporations in our market. Our jazz music format is unique in our market, and in itself serves to enrich the culture of our community. WVSU-FM has historically been involved in multiple public service and awareness campaigns, provided local news, and other public service programming. I would applaud and make all efforts to comply with requirements that NCE stations show evidence which demonstrate good-faith efforts to serve their communities. However, I ask

that you strongly consider the actual impact such requirements will have on local public service, if many of these proposals are enforced.

Respectfully submitted,

Andy Parrish

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